

1 NICOLAS A. JAMPOL (State Bar No. 244867)
2 nicolasjampol@dwt.com
3 SAMUEL A. TURNER (State Bar No. 338089)
4 samturner@dwt.com
5 DAVIS WRIGHT TREMAINE LLP
6 865 South Figueroa Street, 24th Floor
7 Los Angeles, California 90017-2566
8 Telephone: (213) 633-6800
9 Fax: (213) 633-6899

6 AMANDA LEVINE (*pro hac vice*)
7 amandalevine@dwt.com
8 DAVIS WRIGHT TREMAINE LLP
9 1251 Avenue of the Americas, 21st Floor
New York, New York 10020
Telephone: (212) 489-8230
Fax: (212) 489-8340

10 Attorneys for Defendants
11 AMAZON STUDIOS LLC, AMAZON
12 CONTENT SERVICES LLC, PATRICK
MCKAY, JOHN D. PAYNE, JEFF BEZOS,
AND JENNIFER SALKE

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

17 DEMETRIOS POLYCHRON, an
18 individual

19 Plaintiff,

20 vs.

21 JEFF BEZOS, an individual, JENNIFER
SALKE, an individual, SIMON
TOLKIEN, an individual, PATRICK
MCKAY, an individual, JOHN D.
PAYNE, an individual, AMAZON
STUDIOS LLC, a California Limited
Liability Company, AMAZON
CONTENT SERVICES LLC, a Delaware
Limited Liability Company, THE
TOLKIEN ESTATE, THE TOLKIEN
ESTATE LIMITED, THE TOLKIEN
TRUST, and DOES 1-100

27 Defendants.
28

Case No. 2:23-cv-02831-SVW (Ex)

**DECLARATION OF AMANDA
LEVINE IN SUPPORT OF
AMAZON DEFENDANTS'
MOTION TO DISMISS**

DECLARATION OF AMANDA LEVINE

I, Amanda Levine, declare as follows:

3 1. I am an attorney admitted to practice before all courts of the State of
4 New York, the U.S. District Courts for the Southern and Eastern Districts of New
5 York, and the U.S. Court of Appeals for the Second Circuit, and am admitted to
6 practice *pro hac vice* in this action. I am an associate in the law firm of Davis
7 Wright Tremaine LLP, and I am one of the attorneys representing defendants
8 Amazon Studios LLC, Amazon Content Services LLC, Patrick McKay, John D.
9 Payne, Jeff Bezos, and Jennifer Salke (collectively, the “Amazon Defendants”) in
10 this matter. If called to testify, I could and would competently testify to these facts.

11 2. In support of their concurrently filed motion to dismiss, the Amazon
12 Defendants will be separately lodging with this Court a link containing **Exhibit 1**,
13 which contains the eight episodes comprising the first season of Amazon's original
14 series, *The Lord of the Rings: Rings of Power*.

15 I declare under penalty of perjury under the laws of the United States of
16 America and the State of California that the foregoing is true and correct, and that
17 this Declaration was executed on the 27th day of July, 2023, in New York, New
18 York.

Amanda Lene

Amanda Levine